

**REQUEST FOR RENEWAL OF SPECIAL TEMPORARY AUTHORITY
(Response to Question 8 of FCC Form)**

Pursuant to Section 25.120(b)(2) of the Commission's rules,¹ EchoStar Satellite Operating Corporation (together with its affiliates, "EchoStar") hereby requests a 180-day renewal of its special temporary authorization ("STA") to operate the EchoStar 3 satellite at 61.8° W.L. as an in-orbit spare. Specifically, EchoStar requests continued authority to conduct TT&C using the following frequencies: 17301.5 MHz (command); and 12201.0 MHz, 12203.0 MHz, and 12699.0 MHz (telemetry). The current STA expires on December 16, 2016.²

EchoStar launched the EchoStar 16 satellite in November 2012 to provide additional service for its customer, DISH Network L.L.C., at the nominal 61.5° W.L. orbital location. In anticipation of the arrival of EchoStar 16 at 61.5° W.L., and to provide adequate station-keeping margins for all the satellites in the 61.5° W.L. orbital cluster,³ EchoStar repositioned EchoStar 3 to 61.8° W.L. in early 2012.⁴ Operating at 61.8° W.L. as an in-orbit spare, EchoStar 3 remains available, if needed, for repositioning within the nominal 61.5° W.L. orbital cluster to provide service. Accordingly, grant of the requested STA renewal is in the public interest.

The requested STA renewal is in the public interest for the same reasons that the Commission granted the existing STA.⁵ Specifically, grant of this application will ensure safe station-keeping margins for each satellite located at the nominal 61.5° W.L. orbital location.

¹ 47 C.F.R. § 25.120(b)(2).

² See Stamp Grant, File No. SAT-STA-20160603-00055 (granted July 27, 2016).

³ EchoStar 18 and EchoStar 16 are providing service at 61.35° W.L., and 61.5° W.L., respectively. Additionally, EchoStar 3, EchoStar 12, and EchoStar 15 are operating at 61.8° W.L., 61.2° W.L., and 61.65° W.L., respectively, as in-orbit spares.

⁴ See Stamp Grant, File No. SAT-STA-20120424-00073 (granted Apr. 30, 2012).

⁵ See *id.*

Further, grant of this application will not cause harmful interference because EchoStar will conduct TT&C operations with EchoStar 3 at 61.8° W.L. in accordance with the conditions imposed on the original STA grant.⁶

⁶ *See id.*